



AJ Burton

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August 22, 2016

VIA IBFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

Re: Higher Ground LLC Application for Blanket Earth Station License, IBFS File No. SES-LIC-20150616-00357, Call Sign E150095

Dear Ms. Dortch:

Like CenturyLink,¹ the Fixed Wireless Communications Coalition (FWCC),² and the National Spectrum Management Association (NSMA),³ Frontier Communications (Frontier) shares concerns regarding Higher Ground LLC's application for a blanket earth station license. In particular, Frontier is concerned that Higher Ground's proposal in its application is untested and unproven, will cause interference, will create problems that are difficult to detect and discontinue, and bypasses significant interference protections without appropriate opportunity to comment. Frontier thus requests that the Commission reject Higher Ground's waiver request and that, if the Commission is interested in continuing to examine this proposal, it do so through the traditional rulemaking process.

Frontier is a license holder in the 5925-6425 MHz band, and, much like CenturyLink, Frontier is concerned that Higher Ground's proposed use of frequencies in the 5925-6425 MHz band will cause harmful interference to Frontier's fixed microwave facilities. Frontier currently has over 250 licensed microwave paths using these frequencies located throughout the nation, primarily in rural and suburban areas. The average path length for these paths is paths between 20 to 50 miles, suggesting that Frontier could suffer extensive interference from Higher Ground's proposed operations. Frontier uses these paths principally for public switched telephone network (PSTN) traffic as well as for some data and video traffic.

Frontier is concerned that Higher Ground's proposal, without further scrutiny and the opportunity

¹ See CenturyLink, Reply in Opposition to Application, IBFS File No. SES-LIC-20150616-00357 (Sept. 28, 2015).

² See *Ex Parte* letter from Cheng-Yi Liu, Counsel to the Fixed Wireless Communications Coalition, to Marlene Dortch, IBFS File No. SES-LIC-20150616-00357 (July 29, 2016).

³ See Comments of the National Spectrum Management Association, IBFS File No. SES-LIC-20150616-00357 (Oct. 6, 2015).

for widespread public comment, could cause interference with Frontier's operations that would be very difficult to detect and correct, and that would be very harmful to Frontier's business. Frontier only very recently learned about Higher Ground's proposal through a July 2016 notification letter from Commsearch. With PSTN traffic comprising much of Frontier's activity in the band, any interference could, of course, threaten the quality of Frontier's voice network. Necessarily, potential interference would also implicate public safety, especially any 911 calls that ride over these links. Frontier would have little to no visibility into problems except through customer complaints, and, even then, it would be very difficult for Frontier to trace any cause given so many different moving parts in the network. In addition to the potential serious issues with public safety, Frontier's customers will ultimately blame Frontier for any perceived degradation in voice, data, or video service, and Frontier would have little to no insight into the cause or recourse to fix the problem.

For these reasons, like the other parties in this proceeding, Frontier requests that the Commission deny Higher Ground's application and defer these issues to a rulemaking proceeding if it wishes to continue to consider them. Please feel free to contact me with any further questions.

Sincerely,

/s/ AJ Burton

AJ Burton

cc (via email):

Mindel De La Torre
José Albuquerque
Kerry Murray
Stephen Duall
Paul Blais
Cindy Spiers
Hsing Liu
Jay Whaley

Blaise Scinto
John Schauble
Stephen Buenzow
Tiffany West Smink, CenturyLink
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David E. Meyer, NSMA
Adam D. Krinsky, Higher Ground
Susan H. Crandall, Intelsat